

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

In re Bair Hugger Forced Air Warming
Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

This Document Relates to All Actions

DECLARATION OF GENEVIEVE M. ZIMMERMAN

1. My name is Genevieve M. Zimmerman and I am a Partner with the Meshbeshier & Spence Ltd. law firm. I am a member of the Court appointed Co-Lead Counsel in the above entitled matter. The following documents are hereby attached, and submitted in support of Plaintiffs' Motion for *In Camera* Review:
2. Exhibit 1, which is a true and correct copy of Plaintiffs' Challenges to Work Product Claims.
3. Exhibit 2, which is a true and correct copy of Plaintiffs' Challenges to Attorney-Client Privilege Claims.
4. Exhibit 3, which is a true and correct copy of Plaintiffs' Challenges to Defendants' Priv. Log for Crime Fraud Exception.
5. Exhibit 4, which is a true and correct copy of Plaintiffs' September 28, 2016 Letter to Defense Counsel.
6. Exhibit 5, which is a true and correct copy of Defendants' October 28, 2017 Letter to Plaintiffs' Counsel.
7. Exhibit 6, which is a true and correct copy of Plaintiffs' November 8, 2016 Letter to Defense Counsel.

8. Exhibit 7, which is a true and correct copy of Defendants' November 28, 2017 Letter to Plaintiffs' Counsel.
9. Exhibit 8, which is a true and correct copy of Plaintiffs' December 7, 2016 Letter to Defense Counsel.
10. Exhibit 9, which is a true and correct copy of Defendants' December 21, 2016, Letter to Plaintiffs' Counsel.
11. Exhibit 10, which is a true and correct copy of Plaintiffs' January 20, 2017 Letter to Defense Counsel.
12. Exhibit 11, which is a true and correct copy of Plaintiffs' June 5, 2017 Letter to Defense Counsel.
13. Exhibit 12, which is a true and correct copy of 3MBH01192634.
14. Exhibit 13, which is a true and correct copy of 3MBH00544754.
15. Exhibit 14, which is a true and correct copy of Plaintiffs' First Request for Production of Documents and Things regarding Custodial Employment Files.
16. Exhibit 15, which is a true and correct copy of the transcript from the December 22, 2015 teleconference in *Walton v. 3M Co. et. al.*
17. Exhibit 16 is a true and correct copy of Defendants' Answers and Objections to Plaintiffs' Second Interrogatories.
18. Exhibit 17 is a true and correct copy of the Litigation Consultant Agreement between 3M and Gary Maharaj.
19. Exhibit 18, which is a true and correct copy of portions of the deposition of Gary Maharaj, taken March 19, 2015 in the *Walton v. 3M Co. et. al* matter.
20. Exhibit 19, which is a true and correct copy of Gary Maharaj's Affidavit, dated February 6, 2015.

21. Exhibit 20, which is a true and correct copy of MAHARAJ00000205.
22. Exhibit 21, which is a true and correct copy of MAHARAJ00000162.
23. Exhibit 22, which is a true and correct copy of MAHARAJ00000207.
24. Exhibit 23, which is a true and correct copy of portions of the Deposition of Gary Maharaj, taken in Minneapolis on January 18, 2017.
25. Exhibit 24, which is a true and correct copy of portions of the Deposition of Gary Hanson, taken in Minneapolis on November 2, 2016.
26. Exhibit 25, which is a true and correct copy of the Litigation Consultant Agreement between 3M and Teri Woodwick-Sides.
27. Exhibit 26, which is a true and correct copy of portions of the Deposition of Teri Woodwick-Sides taken in Minneapolis on December 8, 2016.
28. Exhibit 27, which is a true and correct copy of portions of the Deposition of Karl Zgota taken in Minneapolis on July 22, 2015.
29. Exhibit 28, which is a true and correct copy of portions of the Deposition of Karl Zgota taken in Minneapolis on February 24, 2017.
30. Exhibit 29, which is a true and correct copy of portions of the Deposition of John Rock, taken in Minneapolis on July 16, 2015.
31. Exhibit 30, which is a true and correct copy of portions of the Deposition of John Rock, taken in Minneapolis on November 4, 2016.
32. Exhibit 31, which is a true and correct copy of 3MBH00022877 .
33. Exhibit 32, which is a true and correct copy of portions of the Deposition of John Rock, taken in Minneapolis on November 4, 2016.

Dated: June 12, 2017

/s/ Genevieve M. Zimmerman

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